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5 Attorneys for Defendants
6 COUNTY OF RIVERSIDE and JOHN
BARTO
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 JOHN DOBBINS; individually and as
12 successor in interest to JENNIFER
DOBBINS, Decedent,

13 Plaintiffs,

14 v.

15 COUNTY OF RIVERSIDE; JOHN
16 BARTO; and DOES 1-10, inclusive,

17 Defendants.
18

Case No. 5:25-cv-01444-JGB-DTB

**DECLARATION OF CAYLIN W.
JONES IN SUPPORT OF
DEFENDANTS' MOTION TO STAY
THE CASE**

Judge: Jesus G. Bernal

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22 I, Caylin W. Jones, declare as follows:

23 1. I am an associate with Burke, Williams & Sorensen, LLP, attorneys of
24 record for Defendants COUNTY OF RIVERSIDE and JOHN BARTO. I have
25 personal knowledge of the facts set forth herein. If called as a witness, I could and
26 would competently testify to the matters stated herein. I make this declaration in
27 support of Defendants' Motion to Stay and corresponding Request for Judicial
28 Notice.

2. As required by Central District Local Rule 7-3, prior to the filing of this motion, on September 15, 2025 I sent a meet and confer letter view email to Plaintiff's counsel. Attached as Exhibit 3 is a true and correct copy of that letter.

3. Thereafter on September 17, 2025, Plaintiff's counsel Marcel Sincich and I discussed these issues via telephone but were unable to come to an agreement.

4. During the post incident investigation into the death of Jennifer Dobbins Plaintiff John Dobbins was interviewed by Investigators from the Department of Justice and Riverside County Sheriff's Department Investigators on August 15, 2024. During that audio taped interview Plaintiff John Dobbins informed investigators that despite there being a protective order in place in Eric Nourani's criminal case, Eric Nourani's criminal attorneys had already shared body worn camera evidence with him.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 24th day of October, 2025, at Los Angeles, California.

/s/ Caylin W. Jones
Caylin W. Jones